

23 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

October 26, 1981

Mr. Jerome Patterson  
Supervisor  
McDonnell Douglas Corp.  
St. Louis Tract I  
P.O. Box 516, Dept. 191C  
St. Louis, Missouri 63166

EPA I.D. NO: MOD000818963

FACILITY LOCATION:  
McDonnell Douglas Corp., Tract I  
Brown Road at Linberg  
Hazelwood, Missouri 63145

Dear Mr. Patterson:

We have conducted a technical Review of your Resource Conversation and Recovery Act (RCRA) Hazardous Waste Notification form and Part A permit application. In order to complete our review we are requesting clarification on several items. These items were discussed briefly with you by telephone on October 20, 1981.

Discarded Commercial Chemical Products (U013, U188):

You are advised that in the November 25, 1980, Federal Register on page 78538 (enclosed), asbestos (U013) was removed from the discarded commercial chemical hazardous waste list. Although asbestos is not presently regulated under RCRA, it is regulated under The Toxic Substances Control Act. Please call Wolfgang Brandner or Marvin Frye at 816/374-6538 for specifics.

In your conversation with Mr. Carasea you stated that you purchase a commercial product that contains 10% phenol. In this case, phenol would not be considered hazardous waste U188 under RCRA regulations and should not be listed on your notification form or Part A permit application as U188.

Electroplating Waste Sludges (F006):

November 12, 1980, Federal Register (enclosed) lists several sub-categories of waste which have been exempted from this waste listing (i.e. F006). The exemptions include: 1. Tin plating on carbon steel. 2. Zinc plating (segregated basis) on carbon steel. 3. Aluminum or zinc-aluminum plating on carbon steel. 4. All cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel. 5. Sulfuric acid anodizing of aluminum. 6. Chemical etching and milling of aluminum.

CK  
B  
If the process waste consists solely of one of the above electroplating sludges, it can be deleted from your notification form and Part A permit application.

ARHM;HAZM:TSS:ACarasea:pc:x6531:10/26/81:Disk 4

CONCURRENCES				
SYMBOL	TSS	TSS	TSS	ARHM
SJRNAME	Carasea	Degner	Foile	Morby
DATE	10-27-81	10/27/81	10/28/81	10/28/81



R00144172  
RCRA RECORDS CENTER

Paint Residues and Sludge Wastes (F017, F018):

ck In the January 16, 1981, Federal Register (enclosed), the Agency temporarily suspended the F017 and F018 wastes from the list of Hazardous Waste from Nonspecific Sources. Since the F017 and F018 listings have been suspended, these wastes would be considered hazardous only if they exhibited one of the hazardous waste characteristics. We are requesting that if these wastes are still handled at the facility then formal testing should be conducted to determine if the wastes exhibit any of the hazardous waste characteristics (i.e. reactivity, ignitability, corrosivity and EP toxicity) as defined in 40 CFR Part 261, May 19, 1980. The results of these tests will determine if the wastes are subject to the regulations.

I am enclosing a blank notification form and a blank Part A permit application. Please make the appropriate changes and return the revised application and notification form to the Environmental Protection Agency (EPA) by November 30, 1981.

If you have any questions, please contact Angelo Carasea at (816) 374-6531 or write to EPA, Region VII, P.O. Box 15606, Kansas City, Missouri 64106-0606

Sincerely yours,

James L. Foil, P.E.  
Chief, Technical Support Section  
Hazardous Materials Branch  
Air and Hazardous Materials Division

Enclosures

cc: John Doyle, MDNR

cc: Wolfgang Brandner: TOPE